VIA ELECTRONIC MAIL FOLLOWED BY OVERNIGHT CARRIER

2/4/2011

Frank Borris, Director
Office of Defects Investigation
Enforcement
1200 New Jersey Ave. S.E.
NVS 210; Room W45302
Washington, D.C. 20590

RE: EA10-005 Supplemental Request Response; Remainder of DJG Response

Dear Mr. Borris;

This submission is the Dorel Juvenile Group (DJG) response to the remainder of the open questions of the EA10-005 Supplemental Information Request.

After extensive research and evaluation of the subject center front adjusters, no defect has been identified by DJG. As of this time the NHTSA has not indicated an identification of a defect of the subject center front adjusters. There is a slight increase in the complaint rate, although extremely low, regarding performance issues in the timeframe between May 1, 2008 and April 7, 2009 on certain child restraint platforms. DJG has conducted research to ascertain the differentiation of the complaint rate between platforms. An update regarding this research has been included. The child restraint systems subject to this investigation are in full compliance with all regulatory compliance requirements.

1. *State the number of each of the following, received by DJG, or of which DJG is otherwise aware and not previously provided, which relate to, or may relate to, the alleged defect in the subject child seats:*
   a. *Consumer complaints;*

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      This supplemental information was previously provided.

   b. *Reports from retailers or distributers;*

      None

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c. *Reports involving a crash, injury, or fatality, based on claims against DJG involving a death or injury, or notices received by DJG alleging or proving that a death or injury was caused by the alleged defect in a subject child seats; and*

None

d. *Lawsuits, both pending and closed, in which DJG is or was a defendant or codefendant.*

None

2. *Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No.1, state the following information:*
   a. *DJG's file number or other identifier used;*
   b. *The category of the item, as identified in Request No.2 (i.e., consumer complaint, report from retailer, etc.);*
   c. *Child seat owner's name, address, and telephone number;*
   d. *Child seat brand name;*
   e. *Child seat model name; C*
   f. *Child seat model number;*
   g. *Child seat model year;*
   h. *Child seat date of manufacture;*
   i. *Incident date;*
   j. *Report or claim date;*
   k. *Number of alleged injuries; and*
   l. *Number of alleged fatalities.*

Please see **Exhibit A** entitled "Request Number Two Data Update"
This supplemental information was previously provided.

3. *Produce copies of all documents related to each item within the scope of Request No.1. Organize the documents separately by category (i.e., consumer complaints, reports from retailers, etc.) and describe the method DJG used for organizing the documents.*

Please see **Exhibit B**.
This supplemental information was previously provided.

4. *State a total count for all of the following categories of claims not previously provided, collectively, that have been paid by DJG that relate to, or may relate to, the alleged defect in the subject child seats: warranty claims; extended warranty claims; claims for good will services that were provided; or similar adjustments and reimbursements; and warranty claims or repairs*

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made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign. Separately, for each such claim, state the following information:

a. *DJG's claim number;*
b. *Child seat owner's name and telephone number;*
c. *Child seat brand name;*
d. *Child seat model name;*
e. *Child seat model number;*
f. *Child seat model year*
g. *Child seat date of manufacture;*
h. *Repair or inspection date;*
i. *Repairing facility's name, telephone number, city and state or ZIP code;*
j. *Labor operation number;*
k. *Problem code;*
l. *Replacement part number(s) and description(s);*
m. *Concern stated by the customer; and*
n. *Comment, if any, by the technician or person(s) making an assessment or repair, and/or the person(s) processing the claim that relate to the claim and/or repair.*

Please see **Exhibit 1** entitled "WARRANTY DATA UPDATE"

5. *Describe in detail the search criteria used by DJG to identify the claims identified in response to Request No.4, including the problem codes, part numbers and any other pertinent parameters used. Provide a list of all problem codes, and problem code descriptions applicable to the alleged defect in the subject child seats. State the terms of the new child seats warranty coverage offered by DJG on the subject child seats (i.e., the number of months for which coverage is provided and the child seats systems that are covered). Describe any extended warranty coverage option(s) related to the alleged defect that DJG offered for the subject child seats and state by option, model, and model year, the number of child seats that are covered under each such extended warranty.*

The criteria used to determine the warranty information is as follows:

1. DJG searched our consumer relations database system using all CFA model numbers from 2008 - 2009 inclusive of all QA codes.
2. Reviewed each record from the query results, read the record comments and determined the consumer resolution. This indicates whether a refund or replacement seat was part of the resolution.
3. The verification was done by reviewing the shipping records for replacements and the check history for refunds.

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6. *Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject child seats that DJG has issued to any retailers or distributors, regional or zone offices, or other such entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications. Also include the latest draft copy of any communication that DJG is planning to issue within the next 120 days.*

   DJG has not issued any service, warranty or any other documents related to the potential CFA performance issue. There are currently no drafts of any communication DJG is planning to issue at this time.

7. *State the number of all comparator child seats DJG has manufactured, or imported for sale, in the United States by brand, model name, model number and model year. Please provide the data by monthly production in a table in Microsoft Access 2000, or a compatible format (e.g., Excel), entitled "COMPARATOR PRODUCTION DATA."*

   Please see **Exhibit 2** entitled "COMPARATOR PRODUCTION DATA"

8. *State the number of each of the following, received by DJG, or of which DJG is otherwise aware, which relate to, or may relate to, an alleged defect in the comparator child seats:*
   a. *Consumer complaints;*

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      This supplemental information was previously provided.

   b. *Reports from retailers or distributors;*

      None

   c. *Reports involving a crash, injury, or fatality, based on claims against DJG involving a death or injury, or notices received by DJG alleging or proving that a death or injury was caused by the alleged defect in a comparator child seats; and*

      None

   d. *Lawsuits, both pending and closed, in which DJG is or was a defendant or codefendant.*

      None

9. *Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No.8, state the following information:*

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a. *DJG's tile number or other identifier used;*
b. *The category of the item, as identified in Request No.2 (i.e., consumer complaint, report from retailer, etc.);*
c. *Child seat owner's name, address, and telephone number;*
d. *Child seat brand name;*
e. *Child seat model name;*
f. *Child seat model number;*
g. *Child seat model year;*
h. *Child seat date of manufacture;*
i. *Incident date;*
j. *Report or claim date;*
k. *Number of alleged injuries; and*
l. *Number of alleged fatalities.*

Please see **Exhibit C** entitled "REQUEST NUMBER NINE (COMPARATOR) DATA
This supplemental information was previously provided.

10. *Produce copies of all documents related to each item within the scope of Request No.8. Organize the documents separately by category (i.e., consumer complaints, reports from retailers, etc.) and describe the method DJG used for organizing the documents.*

Please See **Exhibit D**
This supplemental information was previously provided.

11. *State a total count for all of the following categories of claims that have been paid by DJG that relate to, or may relate to, the alleged defect in the comparator child seats: warranty claims; extended warranty claims; claims for good will services that were provided; or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign. Separately, for each such claim, state the following information:*
    a. *DJG's claim number;*
    b. *Child seat owner's name and telephone number;*
    c. *Child seat brand name;*
    d. *Child seat model name;*
    e. *Child seat model number;*
    f. *Child seat model year*
    g. *Child seat date of manufacture;*
    h. *Repair or inspection date;*
    i. *Repairing facility's name, telephone number, city and state or ZIP code;*
    j. *Labor operation number;*
    k. *Problem code;*

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l. *Replacement part number(s) and description(s);*
m. *Concern stated by the customer; and*
n. *Comment, if any, by the technician or person(s) making an assessment or repair, and/or the person(s) processing the claim that relate to the claim and/or repair.*

Please see **Exhibit 3** entitled "COMPARATOR WARRANTY DATA"

12. *Describe in detail the search criteria used by DJG to identify the claims identified in response to Request No. II, including the problem codes, part numbers and any other pertinent parameters used. Provide a list of all problem codes, and problem code descriptions applicable to the alleged defect in the comparator child seats. State the terms of the new child seats warranty coverage offered by DJG on the comparator child seats (i.e., the number of months for which coverage is provided and the child seats systems that are covered). Describe any extended warranty coverage option(s} related to the alleged defect that DJG offered for the comparator child seats and state by option, model, and model year, the number of child seats that are covered under each such extended warranty.*

The criteria used to determine the warranty information is as follows:

1. DJG searched our consumer relations database system using all CFA model numbers from 2006 – 2007 and 2010 inclusive of all QA codes.
2. Reviewed each record from the query results, read the record comments and determined the consumer resolution. This indicates whether a refund or replacement seat was part of the resolution.
3. The verification was done by reviewing the shipping records for replacements and the check history for refunds.

13. *Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the comparator child seats that DJG has issued to any retailers or distributors, regional or zone offices, or other such entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications. Also include the latest draft copy of any communication that DJG is planning to issue within the next 120 days.*

DJG has not issued any service, warranty or any other documents related to the potential CFA performance issue of comparator child restraint systems. There are currently no drafts of any communication DJG is planning to issue at this time.

14. *In part VII of DJG's September 21, 2010 response to Request No.8 (Assessments) of ODI's July 13, 2010 EA IR letter, DJG stated that the expected date of completion of it's Root Cause Analysis*

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would be early October 2010. Provide the date that DJG anticipates it will inform NHTSA of the conclusion of its Root Cause Analysis.

DJG has done extensive research and evaluation to determine the root cause of the CFA performance deviation. This has been observed in a very small percentage of DJG child restraint systems. At this time, there has been no conclusion reached as to the root cause. The evaluations are included in **Exhibit 4** in response to question 15.

There has also been research conducted to ascertain the differentiation observed between various child restraint platforms relative to the CFA performance complaint rate. An update is included in **Exhibit 5** in response to question 15.

15. *Produce copies of all documents, draft and final, related to each item within the scope of Request No. 14.*

Please see **Exhibits 4 and 5.**

16. *Part a. of Request No.14 of ODI's July 13, 20I 0 EA IR letter requested, in part, DJG's assessment as to why there were no complaint reports submitted regarding child seats manufactured by DJG for MY 2006 or 2007. DJG did not provide a response to this part of the request in any of it's three IR responses. Please provide DJG's assessment as to why there were no complaint reports submitted regarding child seats manufactured by DJG for MY 2006 or 2007.*

DJG did not intentionally disregard submitting complaint reports for MY 2006 and 2007 child restraints made with CFA supplied by IMS. There was a miscommunication in the July EA10-005 Information Request Letter.

In the opening paragraph of the letter, the last two sentences identify the scope of the model years (MY) of the Engineering Analysis EA10-005.

"Based on our analysis of the information received thus far, ODI has upgraded this matter to an Engineering Analysis (EA), which has been assigned the identification number EA10-005. Please note that the scope of this investigation has been expanded to include all child seats manufactured by DJG in model years 2008 and 2009 that are equipped with a CFA for the occupant harness."

As differentiating from PE10-009, the scope of EA10-005 expanded from only the Vantage platform to all DJG child restraints manufactured in MY 2008 and 2009 and that is precisely what DJG submitted in the previous submissions. Based on the scope statement and the information request, DJG submitted the information as requested.

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17. *Identify all subject child seats and/or CFA that have been returned to DJG and identify the following:*
    a. *DJG's claim number;*
    b. *Child seat owner' s name and telephone number;*
    c. *Child seat brand name;*
    d. *Child seat model name;*
    e. *Child seat model number;*
    f. *The CFA manufacturing code number;*
    g. *Child seat model year*
    h. *Child seat date of manufacture;*
    i. *Repair or inspection date;*
    j. *Repairing facility's name, telephone number, city and state or ZIP code;*
    k. *Problem code;*
    l. *Replacement part number(s) and description(s);*
    m. *Concern stated by the customer;*
    n. *Comment, if any, by the technician or person(s) making an assessment or repair, and/or the person(s) processing the claim that relate to the claim and/or repair;*
    o. *Whether the subject child seat and/or CFA is in DJG's possession or control;*
    p. *Whether the subject child seat and/or CF A has been destroyed; and*
    q. *When the subject child seat and/or CF A was destroyed.*

    Please see **Exhibit 6**.

18. *Identify all comparator child seats and/or CFA that have been returned to DJG and identify the following:*
    a. *DJG's claim number;*
    b. *Child seat owner's name and telephone number;*
    c. *Child seat brand name;*
    d. *Child seat model name;*
    e. *Child seat model number;*
    f. *The CF A manufacturing code number;*
    g. *Child seat model year*
    h. *Child seat date of manufacture;*
    i. *Repair or inspection date;*
    j. *Repairing facility's name, telephone number, city and state or ZIP code;*
    k. *Problem code;*
    l. *Replacement part number(s) and description(s);*
    m. *Concern stated by the customer; and*
    n. *Comment, if any, by the technician or person(s) making an assessment or repair, and/or the person(s) processing the claim that relate to the claim and/or repair;*
    o. *Whether the subject child seat and/or CFA is in DJG's possession or control;*

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p. *Whether the subject child seat and/or CFA has been destroyed; and*
q. *When the subject child seat and/or CFA was destroyed.*

Please see **Exhibit 7**.

19. *Describe all modifications and/or changes made by. or on behalf of, DJG in the design, material composition, manufacture, quality control, supply, and/or installation of one or more of the subject component(s), from the start of production of subject child seats up to and including comparator child seats made in or after 20 I 0, equipped with a CFA supplied by IMS (Safety Plus). For each such modification or change, provide the following information:*
    a. *A detailed description of the modification or change;*
    b. *The reason(s) for the modification or change;*
    c. *Whether the modification or change related to the failure of the subject component to impede the ability of the CFA to lock the occupant harness in an intended adjustment position, or resulted in loosening of the harness, including loosening due to child movement or other non-crash related causes;*
    d. *The part number(s) of the original component(s);*
    e. *The part number(s) of the modified component(s); and*
    f. *The name and work location of each person who was involved with the modification or change.*

    Table A is a summary of the engineering changes to the center front adjuster made during the 2008 – 2009 time frames. As shown in Table A, there were three changes to the CFA. As described previously in the response to the PE10-009, there has been a change to the splitter plate, black coating added to the pivot pin, and a change to the pawl profile. There may have been inventory issues which could affect the exact date of implementation of certain models. DJG continues to investigate any changes which may have occurred regarding the manufacture of the CFA throughout its history. The actual engineering change documentation was submitted in DJG 8/31/2010 response as **Exhibit F.** The changes to the pivot pin coating and the pawl profile were done to improve tensile strength of the CFA assembly and to improve the consistency of the observed ultimate tensile strength values. This improved consistency is reflected in the standard deviation values decreasing, indicating less variation of the ultimate tensile strength values. Please see the evaluations identified in response to question 20.

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Table A Modification / Summary

Date of Change	A	B	C	D	E	F
1/28/2008	Changes to small splitter plate	Product Improvement	No	4316-1638	4316-1642	1/28/08 DJG
3/27/2009	Change pivot pin add black coating	Performance Enhancement /Reduce friction	No	4316-1642	4316-1682	3/27/2009 DJG
4/20/2009	Change pawl profile	To improve tensile performance	No	4316-1682	4316-1687	4/20/2009 DJG

As previously reported, there was a process change in the aluminum clamp (pawl) milling operation going from oil cooled to air cooled. Until May 1, 2008 the process utilized oil cooling as the clamps were milled. From May 1, 2008 until April 7, 2009, the process utilized an air cooling process. After this, the process reverted back to utilizing oil cooling. See Table B.

Installation of components - None

Table B Process

	A	B	C	D	E	F
1)	Change from oil cooled clamp milling to air cooled clamp milling process 5/1/08 – 4/7/09	Environmental Concerns	Unknown	No part number change	No part number change	IMS
2)	Move clamp milling process from Subcontractor to IMS 4/7/09 - current	Supplier decision	No	No part number change	No Part number Change	IMS

20. Produce, in chronological order, all documents (as defined herein, including but not limited to emails, memoranda, notes, protocols, analyses, results, and reports); whether draft, interim, or final ; related to any and all modifications and/or changes made by, or on behalf of, DJG in the design, material composition, manufacture, quality control, supply, and/or installation of one or more of the subject component(s), from the start of production of subject child seats up to and

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including comparator child seats made in or after 2010, equipped with a CFA supplied by IMS (Safety Plus).

The actual engineering change documentation was submitted in DJG 8/31/2010 response as **Exhibit F.**

Testing for ECs

- Testing for change to black pivot pin submitted in Exhibit J from DJG 8/31/2010 response
- Testing and evaluation for pawl profile change. Please see **Exhibit 8**.

21. Provide a copy of DJG's consumer registration data for the subject child seats in the states of Maryland and Virginia. Provide this information in Microsoft Access 2000, or a compatible format, entitled "REGISTRATION DATA."

    Please see **Exhibit 9** entitled "REGISTRATION DATA"

22. Provide a copy of DJG's consumer registration data for the comparator child seats in the states of Maryland and Virginia. Provide this information in Microsoft Access 2000, or a compatible format, entitled "COMPARATOR REGISTRATION DATA."

    Please see **Exhibit 10** entitled "COMPARATOR REGISTRATION DATA"

Respectfully Submitted,

Terry Emerson
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